

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
JONESBORO DIVISION**

TRI STATE ADVANCED SURGERY CENTER, LLC,  
GLENN A. CROSBY II, M.D., F.A.C.S., and  
MICHAEL HOOD, M.D.,

Plaintiffs,

vs.

**Civil Action No. 3:14-CV-00143-JM**

HEALTH CHOICE, LLC, and  
CIGNA HEALTHCARE OF TENNESSEE, INC.,

Defendants.

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CONNECTICUT GENERAL LIFE INSURANCE COMPANY,  
CIGNA HEALTH AND LIFE INSURANCE COMPANY and  
CIGNA HEALTHCARE OF TENNESSEE, INC.,

Counterclaim-Plaintiffs,

vs.

SURGICAL CENTER DEVELOPMENT, INC. d/b/a  
SURGCENTER DEVELOPMENT, and  
TRI STATE ADVANCED SURGERY CENTER, LLC,

Counterclaim-Defendants.

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TRI STATE ADVANCED SURGERY CENTER, LLC,

Counter-Counterclaim-Plaintiff,

and

GLENN A. CROSBY, II, M.D. and MICHAEL HOODS, M.D.,

Third-Party Plaintiffs,

vs.

CIGNA HEALTHCARE OF TENNESSEE, INC.,  
CIGNA HEALTH AND LIFE INSURANCE COMPANY, and  
CONNECTICUT GENERAL LIFE INSURANCE COMPANY,

Counter-Counterclaim Defendants.

and

HEALTH CHOICE, LLC,

Third-Party Defendants

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**JOINT REQUEST FOR EXTENSION OF DEADLINE TO  
RESPOND TO DISCOVERY REQUESTS**

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COME NOW Tri State Advanced Surgery Center, LLC, Surgical Center Development, Inc., Dr. Glenn A. Crosby, II, and Dr. Michael Hood (collectively “Tri State Parties”); and Cigna Healthcare of Tennessee, Inc., Connecticut General Life Insurance Company, and Cigna Health and Life Insurance Company (collectively “Cigna Parties”), and file this Joint Motion for Extension of Time of the deadlines to respond to written discovery per Local Rule 6.2.

In support of this Motion, the Tri State Parties and Cigna Parties would respectfully show as follows:

1. The Tri State Parties and Cigna Parties exchanged discovery requests on December 4, 2015.
2. The deadline for the parties to respond to the recently propounded discovery requests is January 4, 2016.
3. Local Rule 6.2 permits the Clerk of Court to grant an extension of the deadline for responding to discovery of up to twenty-one (21) days if the request is unopposed. *See* LR 6.2 (“If the time originally prescribed has not expired and if all counsel consent in writing, the Clerk may enter an order extending for not more than twenty-one (21) days the time . . . to respond to discovery.”).
4. Counsel for the Tri State Parties consulted with Counsel for Cigna on December 29, 2015 via email. Counsel for Cigna agreed in writing to a mutual extension of the deadline to respond to the Dec. 4, 2015 discovery requests.
5. The Tri State Parties as well as the Cigna Parties jointly request an extension of eighteen (18) days, through and including Friday, January 22, 2016, within which to respond to written discovery.

WHEREFORE, PREMISES CONSIDERED, the Tri State Parties and the Cigna Parties request that the Clerk of Court enter an Order extending the deadline for responding to the discovery that was propounded on December 4, 2015 from January 4, 2016 to January 22, 2016.

Respectfully submitted,

/s/ Douglas F. Halijan

Douglas F. Halijan (BPR # 16718)

Molly Glover (Tenn. Bar No. 16113) (admitted pro hac vice)

Shea B. Oliver (Tenn. Bar No. 29330) (admitted pro hac vice)

Charles S. Higgins (Tenn. Bar No. 30184) (admitted pro hac vice)

130 North Court Avenue

Memphis, TN 38103

Phone: (901) 524-5000

Fax: (901) 524-5024

[dhalijan@bpjlaw.com](mailto:dhalijan@bpjlaw.com)

[mglover@bpjlaw.com](mailto:mglover@bpjlaw.com)

[soliver@bpjlaw.com](mailto:soliver@bpjlaw.com)

[chiggins@bpjlaw.com](mailto:chiggins@bpjlaw.com)

Scott Poynter (AR # 90077)

STEEL, WRIGHT, & COLLIER, PLLC

400 W. Capitol Ave., Suite 2910

Little Rock, AR 72201

Phone: (501) 251-1587

[scott@poynterlawgroup.com](mailto:scott@poynterlawgroup.com)

**ATTORNEYS FOR PLAINTIFFS**

/s/ Warren Haskel

Joshua B. Simon

Warren Haskel

Dmitriy G. Tishyevich

(all admitted *pro hac vice*)

Kirkland & Ellis LLP

601 Lexington Avenue

New York, NY 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

[jsimon@kirkland.com](mailto:jsimon@kirkland.com)

[whaskel@kirkland.com](mailto:whaskel@kirkland.com)

[dtishyevich@kirkland.com](mailto:dtishyevich@kirkland.com)

John E. Tull, III (#84150)  
Chad W. Pekron (#2008144)  
Robert Ryan Younger (#2008209)  
Quattlebaum, Grooms, Tull & Burrow, PLLC  
111 Center Street  
Suite 1900  
Little Rock, AR 72201-3325  
Telephone: (501) 379-1700  
[cpekron@qgtb.com](mailto:cpekron@qgtb.com)  
[jtull@qgtb.com](mailto:jtull@qgtb.com)  
[ryounger@qgtb.com](mailto:ryounger@qgtb.com)

**ATTORNEYS FOR CIGNA PARTIES**

**CERTIFICATE OF SERVICE**

I, Douglas F. Halijan, hereby certify that on this 29<sup>th</sup> day of December, 2015, I filed the foregoing with the Clerk of the Court and that the ECF system will send notification of filing to all counsel of record.

/s/ Douglas F. Halijan